

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER TRUST,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

SANDRIDGE MISSISSIPPIAN TRUST I,
et al.,

Defendants.

Case No. 5:15-CV-00634-G

JOINT MOTION FOR SCHEDULE EXTENSION

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1(h), Lead Plaintiffs Ivan Nibur, Deborah Rath, Jase Luna, Matthew Willenbacher, Reed Romine, and the Duane & Virginia Lanier Trust (collectively, “Plaintiffs”), and Defendants James Bennett and Matthew K. Grubb (collectively, “Defendants” and, together with Plaintiffs, the “Parties”) by and through their undersigned counsel, respectfully move the Court for an Order modifying the current schedule compelling Plaintiffs to file their motion and briefing in support of preliminary settlement approval by September 1, 2021 (ECF No. 443), as set forth below.

On June 7, 2021 and August 2, 2021, the Parties filed Joint Motions to Stay Outstanding Motions and Deadlines. ECF Nos. 441, 442 (the “Joint Motions”). In each of the Joint Motions, the Parties advised the Court that they have reached an agreement, in

principle, to settle all claims in the above-captioned matter and the related action captioned *Glitz v. SandRidge Energy, Inc., et al.*, No. 15-cv-01341-G (W.D. Okla. 2012) (the “*Glitz Action*”). The Joint Motions further stipulated that Plaintiffs intended to move for preliminary approval of the settlement on or before September 1, 2021, or if necessary, that Plaintiffs would file a further stipulation requesting additional time to seek preliminary settlement approval. ECF No. 441 at 2; ECF No. 442 at 2. The Court granted the Joint Motions on August 10, 2021. ECF No. 443.

The Parties have been diligently negotiating a stipulation of settlement and coordinating efforts with the plaintiffs in the *Glitz Action*, but the process is taking longer than initially anticipated because of the complexities of structuring and preparing long-form settlement stipulations governing two related securities class actions, and the Parties are accordingly requesting additional time to finalize the settlement.

RELIEF REQUESTED

The Parties have stipulated to a modest extension of the deadline for Plaintiffs’ preliminary settlement approval motion and briefing, pending approval by the Court, as set forth in the chart below. The Parties hereby request that the deadline for filing Plaintiffs’ preliminary settlement approval papers be modified from on or before September 1, 2021 to on or before October 1, 2021.

Good cause exists to modify the current schedule. The Parties are continuing to formalize the final terms of their settlement and require additional time to complete definitive documentation of their settlement agreement so that they can continue to work towards a successful global resolution of the instant litigation and the related *Glitz Action*.

A proposed order is filed herewith.

Deadline	Current Date	Proposed Date
Plaintiffs to file their motion for preliminary approval of the settlement	September 1, 2021	October 1, 2021

DATED: August 19, 2021

Respectfully submitted,

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Laurence M. Rosen, Esq. (admitted *pro hac vice*)

Phillip Kim, Esq. (admitted *pro hac vice*)

Jonathan Horne, Esq. (admitted *pro hac vice*)

/s/Jonathan Horne

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Dated: August 19, 2021

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and Matthew K. Grubb*

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2021, I electronically transmitted the attached Unopposed Motion for Schedule Extension using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

/s/Jonathan Horne

JONATHAN HORNE